

FILED BY <u>MM</u> D.C.
JAN 19 2023
ANGELA E. NOBLE CLERK U.S. DIST. CT. S. D. OF FLA. - MIAMI

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 22-20124-CR-ALTONAGA(s)(s)

18 U.S.C. § 1591(a)(1)  
18 U.S.C. § 1201(a)(1)  
18 U.S.C. § 1591(d)  
18 U.S.C. § 1952  
18 U.S.C. § 1594(d)  
18 U.S.C. § 981(a)(1)(C)

UNITED STATES OF AMERICA

vs.

**JASON WAGNER,**  
a/k/a "Ace,"  
a/k/a "King Ace,"

Defendant.

SECOND SUPERSEDING INDICTMENT

The Grand Jury charges that:

**COUNT 1**  
**Sex Trafficking by Force and Coercion**  
**(18 U.S.C. § 1591(a)(1))**

From in or around May 2021, through on or about March 17, 2022, in Miami-Dade County,  
in the Southern District of Florida, and elsewhere, the defendant,

**JASON WAGNER,**  
a/k/a "Ace,"  
a/k/a "King Ace,"

did knowingly recruit, entice, harbor, transport, provide, obtain, and maintain by any means a person, that is, VICTIM 1, knowing, and in reckless disregard of the fact, that means of force,

threats of force, and coercion, and any combination of such means, would be used to cause VICTIM 1 to engage in a commercial sex act, said conduct in and affecting interstate and foreign commerce, in violation of Title 18, United States Code, Section 1591(a)(1) and (b)(1).

**COUNT 2**

**Kidnapping**

**(18 U.S.C. § 1201(a)(1))**

Beginning on or about March 17, 2022, and continuing through on or about March 18, 2022, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

**JASON WAGNER,**

**a/k/a "Ace,"**

**a/k/a "King Ace,"**

did knowingly and willfully seize, confine, inveigle, kidnap, abduct, and carry away, a person, that is, VICTIM 1, and did hold that person for reward and otherwise, that is, for the purpose of abuse, intimidation, financial gain, and sexual gratification, and did use a means, facility, and instrumentality of interstate commerce while committing and in furtherance of the commission of the offense, in violation of Title 18, United States Code, Section 1201(a)(1).

**COUNT 3**

**Obstruction of Sex Trafficking Enforcement**

**(18 U.S.C. § 1591(d))**

Beginning on or about March 26, 2022, and continuing through on or about June 30, 2022, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

**JASON WAGNER,**

**a/k/a "Ace,"**

**a/k/a "King Ace,"**

knowingly obstructed, attempted to obstruct, and in any way interfered with and prevented the enforcement of Title 18, United States Code, Section 1591 (Sex Trafficking), in violation of Title 18, United States Code, Section 1591(d).

**COUNT 4**

**Sex Trafficking by Force, Fraud, and Coercion**  
**(18 U.S.C. § 1591(a)(1))**

From in or around August 2021, through in or around January 31, 2022, the exact dates being unknown to the Grand Jury, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

**JASON WAGNER,**  
**a/k/a “Ace,”**  
**a/k/a “King Ace,”**

did knowingly recruit, entice, harbor, transport, provide, obtain, and maintain by any means a person, that is, VICTIM 2, knowing, and in reckless disregard of the fact, that means of force, threats of force, fraud, and coercion, and any combination of such means, would be used to cause VICTIM 2 to engage in a commercial sex act, said conduct in and affecting interstate and foreign commerce, in violation of Title 18, United States Code, Section 1591(a)(1) and (b)(1).

**COUNT 5**

**Sex Trafficking by Force, Fraud, and Coercion**  
**(18 U.S.C. § 1591(a)(1))**

From in or around 2009, through in or around 2010, the exact dates being unknown to the Grand Jury, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

**JASON WAGNER,**  
**a/k/a “Ace,”**  
**a/k/a “King Ace,”**

did knowingly recruit, entice, harbor, transport, provide, obtain, and maintain by any means a person, that is, VICTIM 3, knowing, and in reckless disregard of the fact, that means of force, threats of force, fraud, and coercion, and any combination of such means, would be used to cause

VICTIM 3 to engage in a commercial sex act, said conduct in and affecting interstate and foreign commerce, in violation of Title 18, United States Code, Section 1591(a)(1) and (b)(1).

**COUNT 6**

**Use of a Facility in Interstate and Foreign Commerce in Aid of a Racketeering Enterprise  
(18 U.S.C. § 1952)**

From in or around May 2021, through on or about March 17, 2022, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

**JASON WAGNER,  
a/k/a "Ace,"  
a/k/a "King Ace,"**

did knowingly use a facility in interstate and foreign commerce with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment and carrying on of an unlawful activity, namely, prostitution offenses, in violation of Florida Statutes Sections 796.05 and 796.07, and thereafter did perform and attempt to perform an act to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of said unlawful activity, in violation of Title 18, United States Code, Sections 1952(a)(3) and 2.

**FORFEITURE ALLEGATIONS**

1. The allegations of this Second Superseding Indictment are hereby re-alleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America of certain property in which the defendant, **JASON WAGNER**, has an interest.

2. Upon conviction of a violation of Title 18, United States Code, Section 1591, as alleged in this Second Superseding Indictment, the defendant shall forfeit to the United States: (a) any property, real or personal, that was involved in, used, or intended to be used to commit or to facilitate the commission of such offense, and any property traceable to such property, pursuant to Title 18, United States Code, Section 1594(d)(1); and (b) any property, real or personal,

constituting or derived from, any proceeds that the defendant obtained, directly or indirectly, as a result of such offense, or any property traceable to such property, pursuant to Title 18, United States Code, Section 1594(d)(2).

3. Upon conviction of a violation of Title 18, United States Code, Sections 1201 or 1952, as alleged in this Second Superseding Indictment, the defendant shall forfeit to the United States any property, real or personal, which constitutes or is derived from proceeds traceable to such offense, pursuant to Title 18, United States Code, Section 981(a)(1)(C).

All pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 1594(d), and the procedures set forth in Title 21, United States Code, Section 853, as incorporated by Title 28, United States Code, Section 2461(c).

A TRUE BILL

\_\_\_\_\_  
FOREPERSON  


  
MARKENZY LAPointe  
UNITED STATES ATTORNEY

  
LACEE ELIZABETH MONK  
ASSISTANT UNITED STATES ATTORNEY

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

# UNITED STATES OF AMERICA

**CASE NO.:22-20124-CR-ALTONAGA(s)(s)**

v.

Jason Wagner,

**CERTIFICATE OF TRIAL ATTORNEY\***

## **Superseding Case Information:**

**Court Division (select one)**

Miami       Key West       FTP  
 FTL       WPB

New Defendant(s) (Yes or No) No

### Number of New Defendants 0

Total number of New Counts 0

I do hereby certify that:

1. I have carefully considered the allegations of the indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.
  2. I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, Title 28 U.S.C. §3161.
  3. Interpreter: (Yes or No) No  
List language and/or dialect:
  4. This case will take 7 days for the parties to try.
  5. Please check appropriate category and type of offense listed below:  
(Check only one) (Check only one)  

I <input type="checkbox"/> 0 to 5 days	<input type="checkbox"/> Petty
II <input checked="" type="checkbox"/> 6 to 10 days	<input type="checkbox"/> Minor
III <input type="checkbox"/> 11 to 20 days	<input type="checkbox"/> Misdemeanor
IV <input type="checkbox"/> 21 to 60 days	<input checked="" type="checkbox"/> Felony
V <input type="checkbox"/> 61 days and over	
  6. Has this case been previously filed in this District Court? (Yes or No) Yes  
If yes, Judge Altonaga Case No. 22-20124-CR-ALTONAGA(s)
  7. Has a complaint been filed in this matter? (Yes or No) Yes  
If yes, Magistrate Case No. 22-02451-MJ-LOUIS
  8. Does this case relate to a previously filed matter in this District Court? (Yes or No) No  
If yes, Judge Case No.
  9. Defendant(s) in federal custody as of 3/18/2022
  10. Defendant(s) in state custody as of
  11. Rule 20 from the District of
  12. Is this a potential death penalty case? (Yes or No) No
  13. Does this case originate from a matter pending in the Northern Region of the U.S. Attorney's Office prior to August 8, 2014 (Mag. Judge Shaniek Maynard)? (Yes or No) No
  14. Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to October 3, 2019 (Mag. Judge Jared Strauss)? (Yes or No) No

By:

Jane Elizabeth Monk

Lacee Elizabeth Monk  
Assistant United States Attorney  
FLA Bar No. 100322

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: JASON WAGNER

Case No: 22-20124-CR-ALTONAGA(s)(s)

Count 1:

Sex Trafficking by Force and Coercion

Title 18, United States Code, Section 1591(a)(1) and (b)(1)

\* **Min./Max. Term of Imprisonment:** 15 years' imprisonment/Life imprisonment

\* **Max. Supervised Release:** 5 years/Lifetime

\* **Max. Fine:** \$250,000

Count 2:

Kidnapping

Title 18, United States Code, Section 1201(a)(1)

\* **Max. Term of Imprisonment:** Life imprisonment

\* **Max. Supervised Release:** 5 years

\* **Max. Fine:** \$250,000

Count 3:

Obstruction of Sex Trafficking Enforcement

Title 18, United States Code, Section 1591(d)

\* **Max. Term of Imprisonment:** 25 years' imprisonment

\* **Max. Supervised Release:** 5 years

\* **Max. Fine:** \$250,000

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: JASON WAGNER

Case No: 22-20124-CR-ALTONAGA(s)(s)

Counts 4 and 5:

Sex Trafficking by Force, Fraud, and Coercion

Title 18, United States Code, Section 1591(a)(1) and (b)(1)

\* **Min./Max. Term of Imprisonment:** 15 years' imprisonment/Life imprisonment

\* **Max. Supervised Release:** 5 years/Lifetime

\* **Max. Fine:** \$250,000

Count 6:

Use of a Facility in Interstate and Foreign Commerce in Aid of a Racketeering Enterprise

Title 18, United States Code, Sections 1592(a)(3) and 2

\* **Max. Term of Imprisonment:** 5 years' imprisonment

\* **Max. Supervised Release:** 3 years

\* **Max. Fine:** \$250,000

\*Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.